

REMARKS

Claims 1-26 are currently pending. In the July 2, 2007 Office Action, the Examiner withdrew the previous rejection under 35 U.S.C. § 101, but maintained the previous claim rejections under 35 U.S.C. § 103(a) as being unpatentable over various combinations of U.S. Patent No. 6,691,232 to Wood ("Wood"), U.S. Patent No. 5,339,403 to Parker ("Parker"), U.S. Patent No. 6,766,454 to Riggins ("Riggins"), U.S. Patent No. 5,339,403 to Olden ("Olden"), and U.S. Patent No. 6,754,829 to Butt ("Butt"). Applicant appreciates the withdrawal of the double patenting rejection, but respectfully traverses the pending art rejections for the reasons set forth hereinbelow. In addition, it appears from the latest Office Action that claim 9 has not been rejected over the cited references, and Applicant therefore requests that a notice of allowability be issued for at least claim 9.

A. Claims 1, 3, 11, 13, 19 and 21 Are Not Obvious Over Wood and Parker

In response to the Examiner's rejection of claims 1, 3, 11, 13, 19 and 21 as being obvious over Wood in view of Parker, Applicant respectfully requests reconsideration and withdrawal of the rejection because the Examiner has not established a *prima facie* case of obviousness. To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). Where a rejection is based on the assertion that all claim limitations are found in a number of prior art references, the fact finder must determine "[w]hat the prior art teaches, whether it teaches away from the claimed invention, and whether it motivates a combination of teachings from different references." In re Fulton, 391 F.3d 1195, 1199-1200 (Fed. Cir. 2004).

As a preliminary matter, a *prima facie* case of obviousness has not been established because, as noted above, none of the references, alone or in combination, discloses or suggests using a single sign-on (SSO) agent to not only (1) authenticate a user in response to an initial authentication request by obtaining or retrieving an attribute certificate having authentication data for the user, but also to (2) authenticate the user for subsequent authentication requests made by the SSO agent by using authentication data contained within the attribute certificate, as variously recited in claims 1, 11 and 19. *See, e.g.*, claim 1 ("authenticating the user at the SSO agent for the initial authentication request; retrieving by the SSO agent an attribute certificate

associated with the user; and authenticating the user for subsequent authentication requests via the SSO agent using authentication data within the attribute certificate.”) (emphasis added).

The central role played by the SSO agent is described in the Application as follows:

[0091] It should be noted that, in the preferred embodiment, the client SSO manager requests and receives an attribute certificate from an attribute certificate authority because it is assumed that the client SSO manager adheres to all PKIX protocols. By obtaining and storing an independently issued attribute certificate, the attribute certificate can be verified as an authentic certificate by a third-party application. Moreover, if the client SSO manager were to be modified or replaced at some point in time, the attribute certificate could be independently verified as authentic and then could be used by another SSO application.

* * *

[0093] After obtaining or generating the attribute certificate, thereby completing the configuration phase, user 510 will, at some subsequent point in time, desire to interact with one or more legacy applications 502 on application server 504. Using an appropriate protocol with client SSO manager 510, application server 504 initiates a session for user 500 and requests the user's authentication information for one or more legacy applications. For simplicity of presentation, it can be assumed that the user is initially attempting to access only a single protected resource.

[0094] Preferably before, but possibly after, initiating the session with the application server, the client SSO manager challenges the user to complete an authentication process. Assuming that the user successfully completes this initial sign-on process, the client SSO manager acts as the user's agent to perform any subsequent authentication processing on behalf of the user.

[0095] Continuing with the example, client SSO manager 510 retrieves attribute certificate 530 containing encrypted authentication attributes 526. Client SSO manager 510 locates the appropriate "SvcAuthInfo" attribute within attribute certificate 530 using the "service" field that corresponds to the legacy application that the user is attempted to access. Client SSO manager 510 then extracts the associated "authinfo" data for the corresponding legacy application.

U.S. Patent Publication No. 2002/0144119 (emphasis added).

The centrality of the SSO agent to the initial and subsequent authentication requests is simply not addressed by either of the cited Wood or Parker references, nor by the Examiner's analysis thereof. Nor does either reference (or the Examiner's analysis thereof) meet the requirement that the SSO agent use authentication data from the attribute certificate to authenticate the user for subsequent authentication requests, as required in the claims. On this point, Applicant respectfully submits that the rejection analysis in no way acknowledges the specifically-claimed role of the SSO agent in both the initial authentication request and in the subsequent authentications requests. See, Final Office Action, p. 3. Indeed, the cited passage

from Parker offered by the Examiner to meet the requirement of an “attribute certificate” (Parker, col. 1, lines 40-50) confirms that the *user*, and not any SSO agent, presents the privilege attribute certificate (PAC) to an application as evidence of the user’s access rights. *See*, Parker, col. 1, lines 40-50 (“According to the invention there is provided a distributed computer system capable of supporting a plurality of users and a plurality of applications, the system including an authentication unit for authenticating a user and issuing that user with a privilege attribute certificate (PAC) which can then be presented to an application by the user as evidence of the user’s access rights....”) (emphasis added). Thus, Parker discloses that the *user* presents the privilege attribute certificate, and suggests no role for an SSO agent in this sequence.

As seen from the foregoing (and putting aside for the moment to propriety of combining the Wood and Parker), a *prima facie* case of obviousness has not been established because neither Wood nor Parker disclose or suggest using an SSO agent to both (1) authenticate a user in response to an initial authentication request, and to (2) authenticate the user for subsequent authentication requests using authentication data from an attribute certificate that is retrieved from the SSO agent. Accordingly, claims 1, 11 and 19 are allowable. To the extent that dependent claims 3, 13 and 21 each respectively incorporate the requirements of independent claims 1, 11 and 19, these dependent claims are likewise allowable, even though there are additional differences recited in the dependent claims. For example, claims 3, 13 and 21 each variously recited that the authentication data is forwarded from the SSO agent to the protected resource. Again, this requirement is not met by either of the cited Wood or Parker references. For at least the foregoing reasons, Applicant respectfully requests that the obviousness rejections of claims 1, 3, 11, 13, 19 and 21 over Wood and Parker be withdrawn and that the claims be allowed.

B. Claims 2, 5, 12, 15, 20 and 23 Are Not Obvious Over Wood, Parker and Riggins

In response to the Examiner’s rejection of claims 2, 5, 12, 15, 20 and 23 as being obvious over Wood, Parker and Riggins, Applicant respectfully requests reconsideration and withdrawal of the rejection because, as explained above with reference to independent claims 1, 11 and 19, none of the references disclose or suggest using a single sign-on (SSO) agent to not only (1) authenticate a user in response to an initial authentication request by obtaining or retrieving an attribute certificate having authentication data for the user, but also to (2) authenticate the user for subsequent authentication requests made by the SSO agent by using authentication data contained within the attribute certificate, as variously recited in claims 1, 11 and 19. Likewise,

none of the references disclose that the authentication data is forwarded from the SSO agent to the protected resource, as variously recited in claims 3, 13 and 21 from which claims 5, 15 and 23 depend. In particular, the deficiencies noted above with respect to Wood and Parker are not remedied by the disclosure of Riggins.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). Putting aside for the moment to propriety of combining these three references, a *prima facie* case of obviousness has not been established because none of the Wood, Parker or Riggins references disclose Applicant's use of an SSO agent for authenticating a user for an initial and subsequent authentication requests using authentication data from an attribute certificate obtained by the SSO agent. For at least the foregoing reasons, Applicant respectfully requests that the obviousness rejections of claims 2, 5, 12, 15, 20 and 23 over Wood, Parker and Riggins be withdrawn and that the claims be allowed.

C. Claims 4, 6, 7, 10, 14, 16, 17, 22, 24 and 25 Are Not Obvious Over Wood, Parker and Olden

In response to the Examiner's rejection of claims 4, 6, 7, 10, 14, 16, 17, 22, 24 and 25 as being obvious over Wood, Parker and Olden, Applicant respectfully requests reconsideration and withdrawal of the rejection because, as explained above with reference to independent claims 1, 11 and 19, none of the references disclose or suggest using a single sign-on (SSO) agent to not only (1) authenticate a user in response to an initial authentication request by obtaining or retrieving an attribute certificate having authentication data for the user, but also to (2) authenticate the user for subsequent authentication requests made by the SSO agent by using authentication data contained within the attribute certificate, as variously recited in claims 1, 11 and 19. Likewise, none of the references disclose that the authentication data is forwarded from the SSO agent to the protected resource, as variously recited in claims 3, 13 and 21 from which claims 4, 6, 14, 16, 22 and 24 depend. In particular, the deficiencies noted above with respect to Wood and Parker are not remedied by the disclosure of Olden.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). Putting aside for the moment to propriety of combining these three references, a *prima facie* case of obviousness

has not been established because none of the Wood, Parker or Olden references disclose Applicant's use of an SSO agent for authenticating a user for an initial and subsequent authentication requests using authentication data from an attribute certificate obtained by the SSO agent. For at least the foregoing reasons, Applicant respectfully requests that the obviousness rejections of claims 4, 6, 7, 10, 14, 16, 17, 22, 24 and 25 over Wood, Parker and Olden be withdrawn and that the claims be allowed.

D. Claims 8, 18 and 26 Are Not Obvious Over Wood, Parker and Butt

In response to the Examiner's rejection of claims 8, 18 and 26 as being obvious over Wood, Parker and Butt, Applicant respectfully requests reconsideration and withdrawal of the rejection because, as explained above with reference to independent claims 1, 11 and 19, none of the references disclose or suggest using a single sign-on (SSO) agent to not only (1) authenticate a user in response to an initial authentication request by obtaining or retrieving an attribute certificate having authentication data for the user, but also to (2) authenticate the user for subsequent authentication requests made by the SSO agent by using authentication data contained within the attribute certificate, as variously recited in claims 1, 11 and 19. In particular, the deficiencies noted above with respect to Wood and Parker are not remedied by the disclosure of Butt.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). Putting aside for the moment to propriety of combining these three references, a *prima facie* case of obviousness has not been established because none of the Wood, Parker or Butt references disclose Applicant's use of an SSO agent for authenticating a user for an initial and subsequent authentication requests using authentication data from an attribute certificate obtained by the SSO agent. For at least the foregoing reasons, Applicant respectfully requests that the obviousness rejections of claims 8, 18, and 26 over Wood, Parker and Olden be withdrawn and that the claims be allowed.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned at (512) 338-9100.

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Respectfully submitted,

/Michael Rocco Cannatti/

Michael Rocco Cannatti
Attorney for Applicant
Reg. No. 34,791